



December 10, 2004
(Via certified or express mail)

Mr. Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Mr. Thomas Martin, Esq.
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
Monthly Report; November 1 – November 30, 2004 Reporting Period**

Dear Mr. Turner and Mr. Martin,

Enclosed is the Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting and covers the period from November 1 to November 30 2004.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven D. Smith", is written over a faint, circular stamp.

Steven D. Smith
Project Coordinator

cc: Nabil Fayoumi – USEPA Region 5
Sandra Bron - IEPA
Mike Coffey - USFW
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski- Monsanto
Linda Tape - Husch & Eppenger

EPA Region 5 Records Ctr.



226605

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Status Report

Date of Report: December 10, 2004
Period Covered: November 1, 2004 – November 30, 2004

Work Performed During the Reporting Period

Groundwater Monitoring

- *Revision 01 of the Draft Groundwater Monitoring Plan - submitted to the Agencies on August 3, 2001. Although it has not received Agency approval, it has been implemented.*

TSCA Containment Cell

- *The Operations and Maintenance Report - submitted for the Agencies' review and approval on August 28, 2001- remain under review. Portions of the Plan applicable to the placement of sediments have already been approved.*
- Performed inspections of the site.
- Inspected and maintained the 6oz. geotextile/6 mil scrim reinforced poly cover over the containment cell.
- Maintained stormwater and leachate collection controls around the containment cell.
- Monitored support area facilities.
- Third quarter samples of the groundwater monitoring wells around the cell are being analyzed.

Dead Creek

At a meeting held on April 20, 2004, the U.S. EPA requested a conceptual plan for completion of the removal of the bottom soils in Dead Creek. That plan was to be based on soil removal in Creek Sectors F and D and, if sufficient room exists in the containment cell, excavation of portions of in Creek Sector B. The plan was submitted to the Agencies on May 17, 2004. Conditional approval for removal of additional soils from Creek Sectors F, D, and B and for construction of the final cover on the sediment containment cell was received in a letter dated September 14, 2004. The letter also

approved the installation of a liner in **Creek Sector B**, provided the U.S. EPA separately approves the design of the liner system. A **schedule** for implementation of the work was submitted to the EPA on September 30, 2004 and was approved by the Agency on October 11, 2004.

A contract was awarded to Philip Services Corporation (PSC) of Columbia, Illinois to perform the creek dewatering work. PSC **completed** mobilization by the end of October and started pumping water from Creek Sectors **B** and **F** in November.

The existing pumping system in Dead Creek **has kept** Creek Sector D dry. Consequently, creek bottom soil sampling was **completed in this sector** by the end of October. These samples were sent to the laboratory for **PCB analyses** and sample splits were also submitted for immunoassay screening. **The screening results** were received in early November and indicated that only the **surficial** (0-1 foot depth range) soils at one locating contained PCBs in excess of 0.5 ppm. **This suggests** that the extent of excavation in Creek Sector D may be significantly **less than** indicated in the Work Plan. This remains to be confirmed by the laboratory test **results, which** are expected in the early part of December. Creek Sector F was **pumped down** by the last week of November and sampling in the bottom of the creek **began on** November 29th.

A meeting was held with the Agencies **and with** the State and County Highway Departments to discuss road and **drainage improvement** works that the County intends to construct on Judith Lane in 2005. It is **likely that** the lining of Creek Sector B will be complete by the time that the road and **drainage** works commence. Consequently, it was agreed that we will provide the County **with details** of the lining system design by the first week of December. This will **allow the** County to include these details in their bid documents, in the expectation that the **road works** contractor will have to restore the lining at the culvert locations on the **upstream** side of Judith Lane. We also agreed to excavate between 70 and 90 cubic yards of soil from the creek to permit culvert extensions to be constructed by the County. The Highway Department will be responsible for staking out the **excavation locations** and grades and the excavated material will be placed in the TSCA **containment** cell on Judith Lane.

Comments on the Creek Bottom Soil **Removal** Action Work Plan were received from the Agency on November 10th. Draft **responses** to those comments were submitted to the Agency for review on November 23rd.

Data Submittal

No data are submitted with this report.

Work Scheduled for Next Reporting Period

- Conduct routine inspection of **the containment** cell.
- Continue operation of the **stormwater** treatment system.

- Perform necessary operation **and maintenance** activities on the containment cell and temporary treatment system.
- Complete analyses of third quarter **2004** groundwater samples from monitoring wells.
- Collect fourth quarter groundwater **samples** from monitoring wells around the containment cell.
- Review and validate analytical **data from** soil samples in Creek Sector D.
- Complete sampling of creek **bottom soils** in Creek Sector F.
- Finalize the designs for the **lining in Creek Sector B**.
- Submit liner design details to **the St. Clair County** Department of Transport for that portion of the liner adjacent to **Judith Lane**.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %